

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Plaintiff,

v.

B4B EARTH TEA LLC, B4B CORP.,  
and ANDREW MARTIN SINCLAIR,

Defendants.

**AFFIDAVIT  
LOCAL RULE 7.2**

Civil Action No.  
22-CV-1159

(Vitaliano, J.)  
(Levy, M.J.)

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**AFFIDAVIT CONCERNING LOCAL RULE 7.2**

Pursuant to 28 U.S.C. § 1746, I declare as follows:

1. I am an Assistant U.S. Attorney for the United States Attorney's Office for the Eastern District of New York and am counsel for the United States in this matter.

2. I submit this Affidavit pursuant to Individual Motion Practice and Rules of Judge Eric N. Vitaliano III.H. (Cases Involving *Pro Se* Litigants) and pursuant to Local Civil Rule 7.2 (Authorities to be Provided to Pro Se Litigants).

3. On December 11, 2023, the United States will file a response on ECF to the Defendants' motion to compel. Prior to that filing, I provided to Defendant Andrew Martin Sinclair, via email, copies of cases and other authorities cited by the United States in its response. The material was contained in a Zip file attached to an email I sent to Mr. Sinclair, at [asinclairhg@gmail.com](mailto:asinclairhg@gmail.com), on December 11, 2023.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 11, 2023

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Michael S. Blume